February 17, 2005

Francine Torres
National Organic Program
USDA-AMS-TMP-NOP
1400 Independence Ave., SW
Room 4008-So, Ag Stop 0268
Washington, DC 20250-0200

Dear Ms. Torres,

I wish to comment in support of ferric phosphate's inclusion of the national list as a permitted synthetic substance, to be allowed without restrictions. I understand that the petition for ferric phosphate will be reviewed at the 2/28-3/3, 2005 NOSB meeting.

My name is Brian Caldwell and I am currently Farm Education Coordinator for the Northeast Organic Farming Association of New York. I advise over 300 organic farmers in New York State on production and management practices. I also have over 25 years of experience as a producer of commercial organic vegetables and fruit.

I will address the objections noted by TAP reviewers #1 and #3, which are that sufficient alternative controls for slugs and snails are already available to organic farmers, so this material is not needed. I disagree with this assessment.

I agree that there are cultural methods which will control slugs and snails (below I will use "slugs" to refer to both). The best of these is to maintain large fields that are intensively tilled and kept bare throughout the year except for the cash crop. By depriving slugs of food (living and dead plant material) and shelter, this method effectively reduces their presence and damage. However, this method flies in the face of good soil husbandry, including such practices as growing cover crops, underseeding, mulching with organic materials, maintaining beneficial insect habitat strips, etc.

When these practices, central to good organic soil management, are applied here in the humid northeast, slug populations are often greatly enhanced and far outstrip the ability of natural enemies to control them. They will reduce seedling stands of many crops. Probably their biggest impact is on lettuce and strawberries, two important high value organic crops. Slugs physically infest lettuce heads and cause consumer rejection. They eat holes in strawberries, a mulched crop. They also eat holes in the valuable, early-yielding lower trusses of tomatoes, even when the plants are trellised.

Growers of large and small scale have attempted to reduce slug damage with such methods as beer traps, repellants, and barriers, as mentioned (category 2, section 4). However, all I have spoken to who have used these techniques have been dissatisfied with the results, and usually have abandoned them. Often, they have either accepted damage, or implemented intensive tillage and bare culture, to the detriment of their soils.

The use of trap or decoy plants is not possible for highly slug-attractive crops such as the ones mentioned above.

So, in summary, the alternatives available to organic farmers in humid areas for slug control include ineffective practices, poor soil husbandry practices, or accepting damage. In my opinion, the environmentally-benign material ferric phosphate should be permitted as a needed, effective management tool to control slugs in organic production.

Thank you.

Sincerely,
Brian Caldwell
Farm Education Coordinator
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